

### REMARKS

The claims now pending in the application are Claims 1 to 17, the independent claims being Claims 1, 9 and 17. Claims 1, 2, 4, 8, 9, 10, 16 and 17 have been amended herein.

In the Official Action dated February 10, 2004, Claims 1, 3, 5, 6, 9, 11, 13, 14 and 17 were rejected under 35 U.S.C. § 102(b), as anticipated by U.S. Patent No. 5,608,703 (Washisu), Claims 2 and 10 were rejected under 35 U.S.C. § 103(a), as unpatentable over the Washisu '703 patent in view of U.S. Patent No. 6,072,525 (Kaneda), and Claims 7, 8, 15 and 16 were rejected under 35 U.S.C. § 103(a), as unpatentable over the Washisu '703 patent in view of U.S. Patent No. 6,348,948 (Kyuma). Reconsideration and withdrawal of the rejections respectfully are requested in view of the above amendments and the following remarks.

Initially, Applicant gratefully acknowledges the Examiner's indication that the application contains allowable subject matter, and that Claims 4 and 12 are allowable over the prior art.

The rejections of the claims over the cited art respectfully are traversed. In this regard, without conceding the propriety of the Examiner's characterization/interpretation of the claim language, or the propriety of the rejections, Claims 1, 2, 4, 8, 9, 10, 16 and 17 have been amended herein even more clearly to recite various novel features of the present invention, with particular attention to the Examiner's comments. No new matter has been added.

The present invention relates to a novel image sensing apparatus, method and storage medium storing a program for executing an image sensing method. In one aspect, as now recited in independent Claim 1, the present invention relates to an image sensing apparatus comprising a noise reduction device that, utilizing time correlation of sensed images, reduces noise added to the sensed image by an internal apparatus factor. A zoom controller controls a zoom magnification factor of the image sensing apparatus and a determination device determines whether the zoom controller is executing a zoom operation. A setting device sets a control value

for time correlation in the noise reduction device according to a determination of the determination device.

In a similar aspect, as now recited in independent Claim 9, the present invention relates to an image sensing method for an image sensing apparatus. The method comprises the steps of reducing noise added by an internal apparatus factor to a sensed image, utilizing time correlation of sensed images, controlling a zoom magnification factor of the image sensing apparatus, determining whether a zoom operation is being executed in the zoom control step, and setting a control value for time correlation in the noise reduction step in accordance with a determination in the determining step.

In a similar aspect, as now recited in independent Claim 17, the present invention relates to a storage medium that stores a program for executing an image sensing method for an image sensing apparatus. In this aspect, the program executes method steps of reducing noise added by an internal apparatus factor to a sensed image, utilizing time correlation of sensed images, controlling a zoom magnification factor of the image sensing apparatus, determining whether a zoom operation is being executed in the zoom magnification factor controlling step, and setting a control value for time correlation in the noise reduction step in accordance with a determination in the determining step.

Each of independent Claims 1, 9 and 17 has been amended to recite more clearly the features wherein noise added to a sensed image by an internal factor of the image sensing apparatus is reduced by utilizing time correlation of sensed images, where a control value for time correlation in the noise reduction is set in accordance with a determination whether a zoom operation is being executed. As discussed in the present application, the internal factor which causes noise may be high density mounting of small components, high speed digitalization, high speed signal processing, high speed component control and the like (see, e.g., page 3, lines 14 to 20).

Applicant submits that the prior art fails to anticipate the present invention. Moreover, Applicant submits that there are differences between the subject matter sought to be patented and the prior art, such that the subject matter taken as a whole would not have been obvious to one of ordinary skill in the art at the time the invention was made.

The Washisu '703 patent relates to an image blur prevention apparatus, and discloses an apparatus and method in which image blur caused by vibration of a camera during image pickup is corrected by detecting a vibration causing the image blur and driving a correction optical system in first or second modes to correct the image blur. However, Applicant submits that the Washisu '703 patent fails to disclose or suggest at least the above-disclosed features of the present invention. Rather, the Washisu '703 patent is directed to correcting noise (image blur) caused by an *external factor* of the camera. Nowhere does the Washisu '703 patent disclose or suggest the features of reducing noise added to a sensed image by an internal factor of the image sensing apparatus, by utilizing time correlation of sensed images, let alone setting a control value for time correlation in the noise reduction in accordance with a determination of whether a zoom operation is being performed, as disclosed and claimed in the present application.

The Kaneda '525 patent relates to an image pickup apparatus effecting object image tracking responsively to object image frame movement and object image movement, and was for its alleged teachings regarding a relation between zoom magnification and camera shake. Without conceding the propriety of the Examiner's characterizations of the Kaneda '525 patent, Applicant submits that the Kaneda '525 patent fails to disclose or suggest at least the above-discussed features of the present invention. Nowhere does the Kaneda '525 patent disclose or suggest the features of reducing noise added to a sensed image by an internal factor of the image sensing apparatus, by utilizing time correlation of sensed images, let alone setting a control value for time correlation in the noise reduction in accordance with a determination of whether a zoom operation is being performed, as disclosed and claimed in the present application. Nor is the

Kaneda '525 patent understood to add anything to the Washisu '703 patent that would make obvious the claimed invention.

The Kyuma '948 patent relates to an interchangeable lens type camera system, and was cited for its disclosure of a camera utilizing optical zoom and electronic zoom in combination. Nevertheless, Applicant submits that the Kyuma '948 patent fails to disclose or suggest the above-discussed features of the present invention. Nowhere does the Kyuma '948 patent disclose or suggest the features of reducing noise added to a sensed image by an internal factor of the apparatus, by utilizing time correlation of sensed images, let alone setting a control value for time correlation in the noise reduction in accordance with a determination of whether a zoom operation is being performed, as disclosed and claimed in the present application. Nor is the Kyuma '948 patent believed to add anything to the Washisu '948 patent and/or the Kaneda '525 patent that would make obvious the claimed invention.

For the above reasons, Applicants submit that independent Claims 1, 9 and 17 are allowable over the cited art.

Claims 2 to 8 and 10 to 16 depend from Claims 1 and 9, respectively, and are believed allowable for the same reasons. Moreover, each of these dependent claims recites additional features in combination with the features of independent Claims 1 and 9, and is believed allowable in its own right. Individual consideration of the dependent claims respectfully is requested.

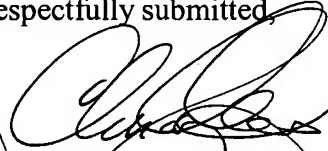
Applicant requests that the present Amendment be entered under 37 CFR § 1.116. Applicant submits that the present amendments merely are minor or formal in nature, and reduce the number of issues for consideration. In particular, Applicant submits the proposed amendments obviate the "alternative" claim language interpretation suggested by the Examiner. In doing so, Applicant submits the proposed amendments do not add significant new issues and reduce the issues for consideration on appeal. Applicant believes the present Amendment was

necessitated by the outstanding Official Action, and submits that the present amendments were not previously made because Applicant believes the prior claims are allowable.

Applicant believes that the present Amendment is responsive to each of the points raised by the Examiner in the Official Action, and submits that the application is in allowable form. Favorable consideration of the claims and passage to issue of the present application at the Examiner's earliest convenience earnestly are solicited.

Applicant's attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,



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